UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF ILLINOIS WESTERN DIVISION

Dale Ludeman,)
Plaintiff,)) NO. 07 C 50216
vs.)
Industrial Molds, Inc.,) Assigned Judge: Philip G. Reinhard)
Defendant.	Designated MagistrateJudge: P. Michael Mahoney

MOTION FOR EXTENSION OF TIME TO PLEAD

The Defendant, Industrial Molds, Inc., respectfully requests the Court for the entry of an order granting it an extension of time to plead to the Plaintiff's Complaint herein, and in support of its motion states as follows:

- 1. Defendant's responsive pleading is due to be filed on November 27, 2007.
- 2. There is another action pending between the same parties based on the same facts, transactions and occurrences pending in the Circuit Court of the 17th Judicial District, Winnebago County, Illinois, as Case No. 06 L 393.
- 3. Defendant will likely file a motion to stay the present proceedings pending the resolution of the state case. However, Defendant may be amenable to the consolidation of both cases before this Court. As such, an answer to the allegations of the complaint are premature at this time.
 - 4. As a result, counsel requests an extension of time to plead to the Complaint.
 - 5. The Plaintiff will suffer no prejudice by reason of this motion.

WHEREFORE, the Defendant, Industrial Molds, Inc. respectfully requests this Court for the entry of an order granting it an extension of time, to plead to the Plaintiff's Complaint, along with such other and further relief as this Court deems just and proper.

Industrial Molds, Inc., Defendant

BY: McGreevy Williams, P.C.

BY: /s/ Donald Q. Manning
Donald Q. Manning

Donald Q. Manning McGreevy Williams, P.C. 6735 Vistagreen Way P.O. Box 2903 Rockford, Illinois 61132-2903 815-639-3700

STATE OF ILLINOIS)
COUNTY OF WINNEBAGO) SS)

AFFIDAVIT OF SERVICE

I, the undersigned, being first duly sworn on oath, depose and state that I served the **Motion for Extension of Time to Plead** attached hereto upon the within named:

William Dietrich Reinhart Boerner Van Deuren, P.C. 2215 Perrygreen Way Rockford, IL 61107

by electronically filing said documents with the Clerk of the Federal Court using the CM/ECF filing system, at or about the hour of ______ o'clock P.M., on the _______ day of November, 2007.

Subscribed and sworn to before me

this day of November, 2007.

NOTARY PUBLIC

"OFFICIAL SEAL
NANCY J. WATTERS
Notary Public, State of Illinois
Notary Public State of Illinois
My Commission Expires 04/16/10